

Karl Kronenberger (CA Bar No. 226112)
karl@krinternetlaw.com
Jeffrey M. Rosenfeld (CA Bar No. 222187)
jeff@krinternetlaw.com
Kronenberger Rosenfeld, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
415-955-1155 Telephone

Rudolph A. Telscher, Jr. (*pro hac vice*)
rudy.telscher@huschblackwell.com
Kara R. Fussner (*pro hac vice*)
kara.fussner@huschblackwell.com
HUSCH BLACKWELL LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
314-480-1500 Telephone

Ryan B. Hauer (*pro hac vice*)
Ryan.hauer@huschblackwell.com
HUSCH BLACKWELL LLP
120 South Riverside Plaza Suite 2200
Chicago, IL 60606
312-526-1572 Telephone

*Attorneys for Defendants/Counterclaim
Plaintiffs BrandTotal, Ltd. and Unimania,
Inc.*

COUNSEL CONTINUED ON NEXT PAGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FACEBOOK, INC., a Delaware corporation,
Plaintiff/Counterclaim
Defendant

BRANDTOTAL LTD., an Israel corporation, and
UNIMANIA, INC., a Delaware corporation.

Defendants/
Counterclaim
Plaintiffs.

Case No. 3:20-CV-07182-JCS

**STIPULATION TO ENLARGE TIME
TO RESPOND TO FACEBOOK,
INC.'S MOTION TO DISMISS PER
L.R. 6-2**

1 WILMER CUTLER PICKERING HALE AND
2 DORR LLP
3 SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
4 THOMAS G. SPRANKLING (SBN 294831)
thomas.sprankling@wilmerhale.com
5 JOSEPH M. LEVY (SBN 329318)
joseph.levy@wilmerhale.com
6 2600 El Camino Real, Suite 400
Palo Alto, CA 94306 USA
Telephone: 650 600 5051

7 ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
8 ALLISON SCHULTZ (*pro hac vice*)
Allison.Schultz@wilmerhale.com
9 ROBIN C. BURRELL (*pro hac vice*)
robin.burrell@wilmerhale.com
10 1875 Pennsylvania Ave, NW
Washington, DC 20006
11 Telephone: (202) 663-6000
Facsimile: (202) 663-6363

12 HUNTON ANDREWS KURTH LLP
13 Ann Marie Mortimer (State Bar No. 169077)
amortimer@HuntonAK.com
14 Jason J. Kim (State Bar No. 221476)
kimj@HuntonAK.com
15 Jeff R. R. Nelson (State Bar No. 301546)
jnelson@HuntonAK.com
16 550 South Hope Street, Suite 2000
Los Angeles, California 90071-2627
17 Telephone: (213) 532-200
Facsimile: (213) 532-2020

18 ***Attorneys for Plaintiff/Counterclaim
Defendant Facebook, Inc.***

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff/Counterclaim Defendant Facebook, Inc.
2 (hereinafter "Facebook") and Defendants/Counterclaim Plaintiffs BrandTotal Ltd. and Unimania, Inc.,
3 (hereinafter "BrandTotal") by and through their respective counsel, hereby stipulate as follows:

4 WHEREAS, Facebook filed and served their Notice of Motion and Motion to Dismiss the
5 Defendants' Counterclaims Pursuant to Fed. R. Civ. P. 12(b)(6) on November 23, 2020 (ECF No. 77)
6 (hereinafter "Motion to Dismiss");

7 WHEREAS, BrandTotal's response to the Motion to Dismiss is currently due December 7,
8 2020;

9 WHEREAS, Facebook's reply in support of its Motion to Dismiss is currently due December
10 14, 2020;

11 WHEREAS, BrandTotal has asked for, and Facebook has consented to, a thirty (30) day
12 extension of time for BrandTotal to file its opposition to the Motion to Dismiss, up to and including
13 January 6, 2020;

14 WHEREAS, Facebook has asked for, and BrandTotal has consented to, a reciprocal twenty-
15 one (21) day extension of time for Facebook to file its reply in support of its Motion to Dismiss, up to
16 and including February 3, 2020;

17 WHEREAS, to accommodate the new briefing timeline for the Motion to Dismiss, the parties
18 respectfully request the hearing date for the Motion to Dismiss be reset to February 19, 2020, or such
19 other date that is convenient for the Court;

20 WHEREAS, this will not affect any other date already set by Court order;

21 **IT IS HEREBY STIPULATED AND AGREED** by Facebook and BrandTotal, pursuant to
22 Civil Local Rules 6-2 and 7-12, that the deadline for BrandTotal to file its opposition to the Motion
23 to Dismiss shall be enlarged up to and including January 6, 2020,¹ that the deadline for Facebook to
24 file its reply in support of the Motion to Dismiss shall be enlarged up to and including February 3,

25
26
27 ¹ The parties have agreed to extend the time for BrandTotal to oppose the motion, not for BrandTotal's
28 deadline to file an amended pleading. BrandTotal reserves the right to request, as part of its opposition,
that any dismissal be without prejudice with leave to amend; Facebook reserves the right to oppose.

1 2020, and it is respectfully requested that the Court reset the hearing date to February 19, 2020 or
2 such other date that is convenient.

3
4 Dated: December 3, 2020

WILMER CUTLER PICKERING, HALE AND
DORR LLP

5 By: /s/ Sonal N. Mehta
6 SONAL N. MEHTA

7 *Attorney for Plaintiff/Counterclaim Defendant*
Facebook, Inc.
8
9

10 Dated: December 3, 2020

11 By: /s/ Rudolph A. Telscher, Jr.
RUDOLPH A. TELSCHER, JR.

12 *Attorney for Defendants/Counterclaim Plaintiffs*
BrandTotal Ltd. and Unimania, Inc.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
SIGNATURE ATTESTATION
4

5 I am the ECF User whose identification and password are being used to file the foregoing
6 Stipulation To Enlarge Time To Respond To Complaint. Pursuant to Civil Local Rule 5-1(i), I
7 hereby attest that the other signatures have concurred in this filing.

8 Dated: December 3, 2020

By: /s/Rudolph A. Telscher, Jr.
RUDOLPH A. TELSCHER, JR.

9
10
11
12
CERTIFICATE OF SERVICE
13

14 I hereby certify that on December 3, 2020, I electronically filed the above document with
15 the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all
16 registered counsel.

17
18 Dated: December 3, 2020

By: /s/Rudolph A. Telscher, Jr.
RUDOLPH A. TELSCHER, JR.